

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COMMONWEALTH OF
MASSACHUSETTS,

Plaintiff,

v.

TREMBLAY’S BUS CO., LLC,

Defendant.

Case No. 1:21-cv-11220

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff Commonwealth of Massachusetts and Defendant Tremblay’s Bus Co., LLC (jointly “the Parties”) respectfully ask this Court to enter their proposed Consent Decree, submitted as Exhibit 1 hereto.

On July 28, 2021, Plaintiff filed a Complaint and a Notice of Commencement of the 45-Day Period with this Court. The Notice informed the Court that the Parties had reached a proposed settlement, and a copy of the Parties’ executed proposed Consent Decree was appended to Plaintiff’s Notice.

Under 42 U.S.C. § 7604(c)(3), the United States has 45 days from receipt of the proposed Consent Decree to complete its review and comment to the Court. On September 13, 2021, 47 days after receipt of the proposed Consent Decree, the United States informed the Parties and the Court that it does not have any objection to the Consent Decree. Accordingly, the Parties request that the Consent Decree be entered. A copy of a letter from the United States Department of Justice is submitted as Exhibit 2 hereto.

September 13, 2021

Respectfully submitted,

COMMONWEALTH OF MASSACHUSETTS

By its attorney,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Brian Clappier

Brian Clappier (Bar No. 569472)

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Date: September 13, 2021

CERTIFICATE OF E-SERVICE

I hereby certify that the parties' Joint Motion, filed electronically through the ECF system with the Court on September 13, 2021, has been sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and copies will be sent to those indicated as non-registered participants on September 13, 2021.

/s/Brian Clappier

Brian Clappier (Bar No. 569472)